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6
7 UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

8 UNITED STATES OF AMERICA,

9 Plaintiff,

10 V.

11 MOHAMED MUHINA,

12 Defendant.
13

Case No. 2:21-mj-553-BNW

Criminal Complaint

Count One

Sexual Exploitation of Children, in violation of
18 U.S.C. § 2251(a) and (e)

14 BEFORE the United States Magistrate Judge, Las Vegas, Nevada, the undersigned
15 Complainant, being first duly sworn, deposes and states:

16 **COUNT ONE**
17 *Sexual Exploitation of Children*
(18 U.S.C. §2251(a) and (e))

18 Beginning on a date unknown and continuing to on or about February 12, 2018, in the
19 State and Federal District of Nevada and elsewhere,

20 **MOHAMED MUHINA,**

21 defendant did employ, use, persuade, induce, entice, and coerce VICTIM-1, to engage in
22 sexually explicit conduct for the purpose of producing any visual depiction of such conduct, and
23 the visual depiction was produced and transmitted using materials that have been mailed,
24 shipped, and transported in or affecting interstate and foreign commerce by any means,

1 including by computer; all in violation of Title 18, United States Code, Sections 2251(a) and (e).

2 **PROBABLE CAUSE AFFIDAVIT**

3 I, Sue Flaherty, Complainant, as and for probable cause, state the following:

4 1. I am currently a Special Agent assigned to the Las Vegas Division of the Federal
5 Bureau of Investigation ("FBI"), Child Exploitation Task Force ("CETF"), and have been
6 employed with the FBI for approximately 25 years. Among my duties on the CETF is to conduct
7 investigations pursuant to the FBI Innocent Images National Initiative ("IINI"), which focuses
8 on crimes where computers and the Internet are used in the sexual exploitation of children. In
9 conducting such investigations, I have gained firsthand knowledge and experience: I have
10 conducted, participated in, and/or consulted in sexual related crimes, and I have executed and
11 participated in numerous search warrants, which have resulted in the seizure of multiple items of
12 child pornography and various items of evidence consisting of child sexual exploitation and
13 abuse. I have received formal training in the investigation as well as on-the-job training through
14 other Special Agents and CETF Officers.

15 2. This Affidavit is made in support of a complaint charging MOHAMED
16 MUHINA with a violation of Title 18, United States Code, Sections 2251(a) and (e), which
17 makes it illegal to employ, use, persuade, induce, entice, and coerce a minor to engage in, any
18 sexually explicit conduct for the purpose of producing any visual depiction of such conduct, and
19 that visual depiction was produced and transmitted using materials that have been mailed,
20 shipped, and transported in and affecting interstate and foreign commerce by any means,
21 including by computer.

22 3. The statements contained in this affidavit are based on a North Las Vegas Police
23 Department investigation for which I have been personally involved in and also includes
24 information obtained from other law enforcement officials involved in the investigation. I have

1 not included each and every fact known to me, but rather have included information establishing
2 probable cause. All times are approximate.

3 **FACTS ESTABLISHING PROBABLE CAUSE**

4 4. On February 12, 2018, North Las Vegas Police Department ("NLVPD")
5 Detective Paul Freeman responded to Sunrise Hospital in Las Vegas, Nevada in regards to a
6 sexual assault report. Detective Freeman was told that a fourteen-year-old female (hereafter
7 identified as VICTIM-1) had told a school employee at Sedway Middle School that she had been
8 sexually assaulted earlier that morning. The school employee called NLVPD.

9 5. Detective Freeman conducted a forensic interview with VICTIM-1 at the
10 Children's Emergency Room at Sunrise Hospital. During the interview, VICTIM-1 said that, in
11 September 2017, she received a private message on Facebook from an individual with the
12 Facebook username "Jordan Junior." VICTIM-1 corresponded with "Jordan Junior" on
13 Facebook. VICTIM-1 said that "Jordan Junior" knew her address, but she did not know how he
14 knew her address.

15 6. On another evening in September 2017, VICTIM-1 said that the person she knew
16 as "Jordan Junior" on Facebook drove to her residence in a white sedan. VICTIM-1 got into the
17 vehicle, and "Jordan Junior" drove to a park located near Legacy High School. "Jordan Junior"
18 pulled VICTIM-1 into the backseat of the vehicle where he removed VICTIM-1's clothing and
19 began to touch VICTIM-1's breasts and vagina. VICTIM-1 said that she told "Jordan Junior," "I
20 don't want to do it." VICTIM-1 said that "Jordan Junior" continued his actions, telling her "I
21 know, I know, I know." "Jordan Junior" proceeded to engage in vaginal intercourse with
22 VICTIM-1. VICTIM-1 told "Jordan Junior" to stop, but he refused and continued the assault
23 until VICTIM-1 began to cry. Afterwards, "Jordan Junior" drove VICTIM-1 back to her
24 residence. VICTIM-1 did not tell anyone about the assault when it occurred.

1 7. In the early evening on September 18, 2017, VICTIM-1 ordered a Lyft ride to take
2 her home. Shortly after placing the order, “Jordan Junior” arrived at her location. VICTIM-1
3 believed “Jordan Junior” was employed with the Lyft ride share service. VICTIM-1 reluctantly
4 got into “Jordan Junior’s” vehicle where after he drove to an unknown elementary school.
5 “Jordan Junior” moved the passenger seat back and climbed on top of VICTIM-1 and engaged
6 in vaginal intercourse with her. Afterwards, “Jordan Junior” drove VICTIM-1 to her residence.
7 Again, VICTIM-1 did not tell anyone about the assault.

8 8. In the evening of an unknown date in January 2018, VICTIM-1 was at Goldcrest
9 Park located in North Las Vegas, Nevada. “Jordan Junior” arrived in his vehicle and told
10 VICTIM-1 to get inside his vehicle. “Jordan Junior” drove her to his apartment, later identified
11 as being located on West Cheyenne Avenue in North Las Vegas, Nevada.¹ A short time after
12 arriving at the apartment, VICTIM-1 fell asleep on “Jordan Junior’s” couch. VICTIM-1 woke up
13 to the feeling of “Jordan Junior” kissing her neck. “Jordan Junior” then began to touch her
14 breasts, buttocks, and vagina. VICTIM-1 said that “Jordan Junior” then engaged in vaginal
15 intercourse with her. VICTIM-1 said when he “finished,” she told him to take her home.

16 9. VICTIM-1 said on the morning of February 12, 2018, at approximately 7:30 a.m.,
17 she was walking to school. As she was walking through her neighborhood, “Jordan Junior”
18 arrived in his vehicle. “Jordan Junior” told VICTIM-1 to get in his vehicle, which she refused.
19 VICTIM-1 said “Jordan Junior” grabbed her by her hair and jacket and forced her into his
20 vehicle. “Jordan Junior” drove them to his apartment. Inside the apartment, VICTIM-1 said that
21 she told “Jordan Junior,” “I don’t want you touching me because I don’t like you.” “Jordan
22 Junior” picked VICTIM-1 up and carried her to his couch. “Jordan Junior” forced VICTIM-1 to
23 sit on his lap. When VICTIM-1 attempted to get up, “Jordan Junior” used his arm to reach
24

¹ The full address is known to investigators.

1 around her throat. VICTIM-1 described this action as a “chokehold.” VICTIM-1 fell to the floor
2 at which time “Jordan Junior” began to remove VICTIM-1’s clothing. VICTIM-1 said she had
3 her cellular telephone and tried to call 9-1-1. Before she could finish dialing 9-1-1, “Jordan
4 Junior” grabbed her cellular telephone and threw it out of her reach. “Jordan Junior” then
5 pushed VICTIM-1 back on the couch where he again engaged in vaginal intercourse with her.
6 VICTIM-1 said “Jordan Junior” used his cellular telephone to record the sexual assault.
7 VICTIM-1 said she resisted and began to scream. “Jordan Junior” threatened her, saying if she
8 did not stop screaming, he would “choke her until she passed out.” VICTIM-1 said she stopped
9 resisting and began to cry. After the assault, VICTIM-1 went to the bathroom and got dressed.
10 She told “Jordan Junior” to take her to school, which he did.

11 10. VICTIM-1 said she was really upset when she walked into her school that
12 morning. She said that was when she told a school employee what had happened to her.

13 11. VICTIM-1 reported that she told “Jordan Junior” on multiple occasions that she
14 was 14 years old.

15 12. VICTIM-1 provided a detailed description of “Jordan Junior,” saying he was a
16 black male with a mole on his left cheek. She said he also had a scar on the right side of his
17 chest. VICTIM-1 said his cellular telephone number began with area code 725. VICTIM-1 was
18 certain she would be able to identify him.

19 13. On February 13, 2018, Detective Freeman obtained the leasing records for the
20 West Cheyenne residence. The apartment was being leased by MOHAMED MUHINA.
21 Detective Freeman obtained a Nevada driver’s license photograph of MOHAMED MUHINA.
22 The individual in the photograph had a mole on his left cheek. An entry in Nevada’s Shared
23 Computer Operation for Protection and Enforcement (“SCOPE”), indicated MOHAMED
24 MUHINA had a scar on his chest. Detective Freeman identified “Jordan Junior’s” account on

1 Facebook. Detective Freeman compared the photographs posted on the "Jordan Junior"
2 Facebook page with the driver's license photograph of MOHAMED MUHINA, and he believed
3 that it was the same individual.

4 14. On February 20, 2018, Detective Freeman met with VICTIM-1 at Sedway Middle
5 School. Detective Freeman showed VICTIM-1 a photo array, which included MOHAMED
6 MUHINA as one of the six individuals depicted. VICTIM-1 immediately identified
7 MOHAMED MUHINA as the individual who recorded himself sexually assaulting her.

8 15. On March 2, 2018, MOHAMED MUHINA was arrested by NLVPD and charged
9 with the sexual assault of a minor under sixteen years contrary to Nev. Rev. Stat. § 200.366.3b
10 and first-degree kidnapping of a minor contrary to Nev. Rev. Stat. § 200.310.1. NLVPD
11 Detective Mark Hoyt read MOHAMED MUHINA his Miranda rights, after which MUHINA
12 agreed to speak with Detective Hoyt. MOHAMED MUHINA confirmed he knew VICTIM-1
13 and that he had a Facebook account in the name of "Jordan Junior." MOHAMED MUHINA
14 said he did take VICTIM-1 to his apartment. He said they engaged in sexual acts while inside his
15 apartment. He also said they engaged in consensual sexual contact while in his vehicle near a
16 high school. MOHAMED MUHINA also admitted to having used his cellular telephone to
17 record sexual contact with VICTIM-1, but claimed that he no longer had the videos.
18 MOHAMED MUHINA claimed that he recently learned that VICTIM-1 was fourteen years
19 old.

20 16. Detective Hoyt also asked MOHAMED MUHINA if he would consent to the
21 search of his vehicle, and MOHAMED MUHINA provided consent. A white Samsung Galaxy
22 S6, IMEI number 990007038807944 was found inside the vehicle plugged into the center
23 console. Samsung mobile phones are not manufactured in the state of Nevada, thus the phone
24 traveled in interstate commerce.

1 17. The cellular telephone was locked and passcode protected. MOHAMED
 2 MUHINA said the phone belonged to a friend and that he utilized the phone to listen to music.
 3 MOHAMED MUHINA also said because the phone belonged to his friend, he did not want to
 4 provide the passcode. On August 1, 2018, North Las Vegas Justice Court Judge Natalie L.
 5 Tyrrell signed a search warrant affidavit authorizing the search of a white Samsung Galaxy S6
 6 cellular telephone, IMEI number 990007038807944, having been seized from inside
 7 MOHAMED MUHINA's vehicle.

8 18. On August 18, 2018, Nevada Attorney General Forensic Examiner Chris
 9 DeFonseka was able to unlock and complete the forensic extraction of the Samsung Galaxy S6
 10 cellular telephone, IMEI number 990007038807944. The results of the extraction were provided
 11 to Detective Hoyt for review. Detective Hoyt reviewed the forensic extraction from the Samsung
 12 Galaxy S6 cellular telephone, IMEI 990007038807944. In doing so, Detective Hoyt observed
 13 several videos and photographs which depicted MOHAMED MUHINA engaged in sex acts
 14 with young black females. Detective Hoyt printed screenshots from four of the videos.

15 19. On August 23, 2018, Detective Hoyt met with VICTIM-1 to show her the four
 16 screenshots from the videos found on the Samsung Galaxy S6 cellular telephone. VICTIM-1
 17 confirmed she was the female depicted in two of the four screenshots. VICTIM-1 signed and
 18 dated the back of the two screenshots. In the screenshots that VICTIM-1 identified, she was
 19 wearing a black, white, and pink bra. VICTIM-1 also said these videos were taken in "Jordan
 20 Junior's" vehicle.

21 20. The following are descriptions of the two videos that VICTIM-1 identified herself
 22 in:²

23
 24 ² Undersigned has presented representative images from the videos described in this
 affidavit. The Magistrate Judge has reviewed those images as part of its probable cause

(footnote cont'd on next page)

1 **File Name:** received_1772432333058947.mp4

2 **Video Length:** 1 minutes and 5 seconds.

3 **Video Description:** The video begins by showing the inside of a vehicle.
4 The vehicle has a light-colored roof with a sunroof. The vehicle also has
5 black seats and doors. The side of a black adult male is seen, wearing
6 only a black shirt. The camera is turned to show briefly, the black adult
7 male's face. The black adult male covers the camera to turn the focus.
8 The camera is then focused on the black male adult, nude from the waist
9 down, laying on top of a young black female. The female is wearing only
10 a black, white, and pink bra. The adult male has his erect penis inserted
11 in the young female's vagina.

12 **File Name:** received_1772429479725899.mp4


13 **Video Length:** 2 minutes and 15 seconds.

14 **Video Description:** The video begins with a young black female seen
15 from mid torso to her face. The female is wearing a black, white, and
16 pink bra. The female appears to be wincing in pain. The camera pans
17 down to show her bra is pulled up exposing her breasts. The camera
18 continues to pan down showing an adult black male, wearing a condom.
19 He has his erect penis inserted into the female's vagina. The female's
20 hand is seen several times in the video in an attempt to prevent the male's
21 penis from being inserted in her vagina. The video appears to be recorded
22 from the back seat of a vehicle.
23
24

determination. The images will be maintained by the case agent during the pendency of this case pursuant to 18 U.S.C. § 3509(m).

CONCLUSION

21. Based on my training, experience and the totality of the facts related, I submit that there is probable cause to believe that MOHAMED MUHINA, defendant herein, has committed the Sexual Exploitation of Children, in violation of 18 U.S.C. § § 2251(a) and (e).


Sue Flaherty
Special Agent
Federal Bureau of Investigation

Subscribed and sworn to before me this 25th day of June, 2021.


HON. JUDGE BRENDA WEKSLE
UNITED STATES MAGISTRATE JUDGE

